

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

STIPULATED MOTION AND
ORDER REGARDING SEALING
OF SUPPLEMENTAL MOTION TO
COMPEL BRIEFING

DEBORAH FRAME-WILSON, *et al.*, on behalf
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

STIP. MOT. & ORDER

RE SEALING OF SUPP. MTN. TO COMPEL BRIEFING

(No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC)

1 The Parties have met and conferred with respect to the upcoming supplemental briefing
2 on Plaintiffs' Motion to Compel, and anticipate that their briefs, declarations, and exhibits will
3 quote from and/or describe in detail a significant amount of information that has been designated
4 as Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon. Accordingly, in order
5 to ensure that such materials are treated appropriately under the applicable protective order, and
6 to reduce burdens on the Court, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their
7 respective counsel, hereby stipulate and agree to the following procedure for filing and sealing in
8 connection with the supplemental motion to compel briefing, subject to the Court's approval.

9 1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its
10 supplemental brief, declarations, exhibits, and all other evidence and declarations on which that
11 Party relies (collectively, "Supplemental Papers") which contain material designated
12 Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon.

13 2. Within two weeks of the filing of the Parties' Supplemental Papers, pursuant to
14 LCR 5(g), the Parties will meet and confer and, as appropriate, file (1) public versions of their
15 Supplemental Papers, with necessary redactions, and (2) corresponding motion(s) to seal
16 pursuant to LCR 5(g)(3). The Party seeking to maintain material under seal (or under redaction)
17 shall be the movant for purposes of any such motion(s) to seal associated with the Parties'
18 Supplemental Papers.

19 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.
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DATED December 9, 2024.

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman

Steve W. Berman (WSBA No. 12536)

By: /s/ Barbara A. Mahoney

Barbara A. Mahoney (WSBA No. 31845)

1301 Second Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292

Facsimile: (206) 623-0594

E-mail: steve@hbsslaw.com

barbaram@hbsslaw.com

Anne F. Johnson (*pro hac vice*)

594 Dean Street, Suite 24

Brooklyn, NY 11238

Telephone: (718) 916-3520

E-mail: annej@hbsslaw.com

KELLER POSTMAN LLC

Zina G. Bash (*pro hac vice*)

111 Congress Avenue, Suite 500

Austin, TX, 78701

Telephone: (512) 690-0990

E-mail: zina.bash@kellerpostman.com

Jessica Beringer (*pro hac vice*)

Alex Dravillas (*pro hac vice*)

Shane Kelly (*pro hac vice*)

150 North Riverside Plaza, Suite 4100

Chicago, Illinois 60606

Telephone: (312) 741-5220

E-mail: Jessica.Beringer@kellerpostman.com

E-mail: ajd@kellerpostman.com

E-mail: shane.kelly@kellerpostman.com

*Interim Co-Lead Counsel for Plaintiffs and the
proposed Class*

DAVIS WRIGHT TREMAINE LLP

By: /s/ John A. Goldmark

John A. Goldmark, WSBA #40980

By: /s/ MaryAnn Almeida

MaryAnn Almeida, WSBA #49086

920 Fifth Avenue, Suite 3300

Seattle, WA 98104-1610

Telephone: (206) 622-3150

Email: JohnGoldmark@dwt.com

Email: MaryAnnAlmeida@dwt.com

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

Karen L. Dunn (*pro hac vice*)

William A. Isaacson (*pro hac vice*)

Amy J. Mauser (*pro hac vice*)

Martha L. Goodman (*pro hac vice*)

Kyle Smith (*pro hac vice*)

2001 K Street, NW

Washington, D.C. 20006-1047

Telephone: (202) 223-7300

Email: kdunn@paulweiss.com

Email: wisaacson@paulweiss.com

Email: amauser@paulweiss.com

Email: mgoodman@paulweiss.com

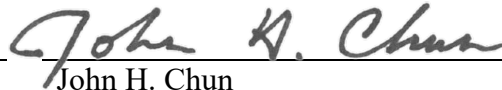
Email: ksmith@paulweiss.com

Attorneys for Defendant Amazon.com, Inc.

1 IT IS SO ORDERED.

2
3 December 9, 2024

4 Dated



John H. Chun

United States District Judge

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STIP. MOT. & ORDER

RE SEALING OF SUPP. MTN. TO COMPEL BRIEFING - 4

(No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC)